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NOT FOR SERVICE OF LITIGATION PAPERS

June 14, 2024

**BY ECF**

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl St.  
New York, New York 10007

Application granted.  
**So ordered.**

Dated:

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE  
June 17, 2024  
New York, New York

Re: Saudi Arabian Airlines Corp. v. IAGCAS, LLC; Case No. 1:21-cv-06971

Dear Judge Buchwald:

We represent Defendant IAGCAS LLC (“IAGCAS”) in the above referenced case, and write pursuant to Rule 21.8 of the Electronic Case Filing Rules & Instructions of the United States District Court for the Southern District of New York and this Court’s Individual Practices H(2) to request that certain exhibits which we are filing along with a letter responding to Plaintiff Saudi Arabian Airlines Corp.’s (“Saudia”) request for a pre-motion conference, be provisionally filed under seal, as all of these exhibits were marked confidential pursuant to the Stipulated Protective Order (ECF#20).

IAGCAS requests the following exhibits to be provisionally filed under seal:

1. Exhibit 2: Transcript of Deposition on Saleh Farouk S. Eid, dated November 9, 2023.
2. Exhibit 4: GACA Saudi Arabian Airline 121 Operations Specification – Aircraft In Long Term Maintenance or Storage, certification signed June 12, 2018 .
3. Exhibit 5: Email dated February 27, 2020 with attachments.
4. Exhibit 6: Email dated February 28, 2022 with attachment.
5. Exhibit 7: Oriel Executive Summary of Detailed Appraisal dated March 15, 2022.
6. Exhibit 8: Email dated March 29, 2022 with attached B777-200ER Sale Project report.
7. Exhibit 9: Email dated September 9, 2022.
8. Exhibit 10: Sale and Purchase Agreement, dated June 7, 2023.

The above exhibits have been designated confidential by Saudia as they contain information that is non-public. We believe that none of the exhibits have been made public, and, upon information and belief, have so far not been relied upon by any court in connection with any exercise of judicial authority.

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As such, IAGCAS respectfully requests that the Court maintain these exhibits under seal until such time that Your Honor rules on whether the materials should remain under seal. To be clear, IAGCAS takes no position on whether these documents should be sealed.

A courtesy copy of our letter response to Plaintiff's letter, together with all exhibits thereto, is being sent to the Court via overnight courier in accordance with Your Honor's Individual Practices.

We thank the Court for its time and attention to this matter.

Respectfully submitted,



David Rosenberg